

You have requested comments on ET Docket 02-98 - RM-9404.

I have held an amateur license since December 1996 and have commercial radiotelephone and radiotelegraph licenses with broadcast engineering and electrical engineering experience.

I have experience in recovering from storms and other local disasters, which have interrupted power service, so I realize how much we depend on reliable power.

With our current fear of sabotage to the infrastructure by terrorists, if the possibility of an arcing antenna insulator or poorly soldered connection shutting down power to the country is real, it would appear there is a serious (exploitable by terrorists) deficiency in the infrastructure. Hopefully when this deficiency is corrected there will be no need for power limits for amateur operation in the 136 KC band.

The radio amateur is willing to spend money and time to experiment without any hope of financial gain because of a personal emotional reward - pride in accomplishment.

The problem then becomes how to allow enough hope of accomplishment to create the experimentation (which may bring unforeseeable benefits) WITHOUT endangering the power grid.

My fear personally would be that my antenna might not have enough losses to be legal if you include the 1 Watt EIRP limit. Not only can I not measure EIRP with anything I can afford, I am unsure if an airplane would be required to measure the "main lobe" which would probably go straight up. When an EIRP limit is imposed, it must be met (proven) will a yearly Proof of Performance be required?

Presently and historically, hams are required to protect certain listening sites on different frequency bands. With this as a precedent, geographical limits on power input have proven practical in the amateur service.

I believe that hams will not put up the massive antennas necessary to have a good Low Frequency signal anywhere near a main (on metal towers) power line. The danger of electrocution from inductive coupling to the power line as well as charging of the wire from wind static and swaying in the earth's magnetic field would create a hazard.

I submit for your consideration that (easily measured) transmitter input power be limited, but only within appropriate distances from substations and main lines.

If it is necessary to limit input power "within X feet of any power line connected to the grid" in order to accomplish the necessary protection until the systems are hardened against deliberate interference from terrorists, then there still will be some locations in the country where it would be safe to erect proper antennas and provide signals for the other experimenters to receive.

I believe that it is necessary to insure that the power lines are protected, and yet allow the amateur with access to a "long pier over salt water" or isolated farm or ranch to fly a kite or Balloon supported antenna (and not

compromise the power line security).

The availability of these "Big" signals would be an incentive for amateurs all over the country to invest the time and money in experimentation.

The existing users of these frequencies have always had financially defined objectives, and it was not financially rewarding to look for anomalies.

Nobody knows what might be discovered in the future.

Perhaps the minerals in the earth will affect propagation.

Perhaps the existing trophy for the first ham radio contact with a station on Mars will be won on this band.

Computer analysis of the logs (PC's and computerized logs were not available years ago) may yield information to benefit us all.

Please, even if you limit access to extra class amateurs, don't kill the incentive. Allow full legal power to large antennas located at a SAFE distance from the power grid.

I am VERY concerned with the request by HID Corporation that "Interference be defined such that part 15 devices are considered as not causing interference to any authorized..." .

There is no excuse for sloppy engineering where \$\$\$ are concerned. This is the case with this for-profit corporation. If they want exclusive use of a part of the spectrum for profit, they need to get licenses and pay the fees like any other for-profit business.

If you let them redefine "interference" in this manner - in this case you will set a precedent and the RF spectrum will become useless.

Someone must remember "Mad man Muntz" and his "ultimate cost reduction TV set".

When a MUNTZ TV was turned on, everyone in the neighborhood had to turn off the AM radios because of horizontal and vertical sweep radiation.

Please, if you ignore everything else I write because I have no "attorney", do NOT allow this "redefinition" of interference just to save corporations from paying you licensing fees.

Thank you,

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